

UNION PACIFIC RAILROAD COMPANY  
ENVIRONMENTAL MANAGEMENT

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Environmental Protection  
Omaha, NE

January 6, 2001

REC'D

JAN 11 2001

RCAP

Mr. Kenneth V. Herstowski, P.E.  
USEPA  
RCRA Corrective Action & Permits Branch  
Air, RCRA and Toxics Division  
901 North 5<sup>th</sup> Street  
Kansas City, KS 66101

Dear Mr. Herstowski:

Please refer to the Administrative Order on Consent (the Order) for the Omaha, Nebraska Shops of the Union Pacific Railroad Company. More specifically, the site is described as 9<sup>th</sup> and Cass Streets, Omaha, Nebraska, RCRA I.D. No. NED000829754.

Per Paragraph 36 in Section VII, Work To Be Performed, of the Order, Union Pacific implemented a corrective measure for excavation and disposal of asbestos-containing soil. The remedy as described in the Interim Measure Workplan included disposal of the asbestos-containing soil at an approved landfill. Specifically, the material has been disposed at Butler County Landfill near David City, Nebraska.

As the remediation project progressed through the summer of 2000, the quantity of asbestos-containing soil significantly increased. This situation caused Union Pacific to evaluate the continuation of disposal at Butler County. Therefore, a meeting was held at the Omaha Shops to discuss an alternative to the asbestos-containing soil disposal method. That is, the material would be excavated and securely placed in the embankment of the relocated



R00177695  
RCRA RECORDS CENTER

Cuming Street, similar to the remedy for the lead-contaminated soil that was approved by EPA. The meeting was attended by representatives of the Nebraska DEQ, the City of Omaha, AMI Group, Jacobson Helgoth Consultants, URS Corporation, and Union Pacific. At the conclusion of the meeting, agreement was tentatively reached for placing the asbestos-containing soil in the relocated Cuming Street embankment. Three copies of the Meeting Record of October 10, 2000, and the Asbestos Area Corrective Action plan are enclosed for your use. The Asbestos Area Corrective Action Plan is dated October 2000.

A letter dated November 22, 2000, was issued by the Nebraska DEQ granting approval to place the asbestos-containing soil in the relocated Cuming Street embankment. Three copies of the letter are enclosed for your use. My letter serves to provide an advisory that Union Pacific has undertaken the placement of the asbestos-containing soil as described in the Asbestos Area Corrective Action plan. The implementation of the alternate remedy will conform to the plan and the approval of the Nebraska DEQ.

If you wish to call me to discuss any aspect of the work please contact me at (402) 271-3675.

Yours truly,

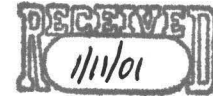


Jeffrey D. McDermott, P.E.  
Mgr. Environmental Site Remediation

ENC

C: Ted Huscher - NDEQ (W/ENC)  
Norm Jackman - City of Omaha (W/ENC)  
Chester Black - City of Omaha (W/ENC)  
Tom Baker - Douglas County (W/ENC)  
C. Dale Jacobson - Jacobson Helgoth (W/ENC)  
Denny Brown - UPRR  
Jeff Smith - URSGWC

**Subject:** *UPRR Omaha Shops Asbestos Area Interim Measures  
Meeting Notes – 10-Oct-00*



**Date:** October 10, 2000

**Time:** 1:30 p.m. to 3:30 p.m CDT

<b>Participants:</b>	Jay Ringenberg	Nebraska Department of Environmental Quality (NDEQ)
	Ed Southwick	NDEQ
	Dave Haldeman	NDEQ
	Jeff McDermott	Union Pacific Railroad (UPRR)
	Bob Sink	City of Omaha Public Works Department
	Larry Owens	AMI Group
	Phil Thomas	AMI Group
	Dale Jacobson	Jacobson Helgoth Consultants
	Steve Jorgenson	Jacobson Helgoth Consultants
	Johnna Roberts	Jacobson Helgoth Consultants
	Chris Poulsen	URS Corporation
	Jeff Smith	URS
	Jeff Williamson	URS

A meeting was held at the URS office trailer located at the UPRR Omaha Shops in Omaha, Nebraska, on October 10, 2000. The purpose of the meeting was to review the progress of the asbestos area interim measures, discuss an alternative asbestos disposal method, and provide an update on the overall project progress for clean-up activities at Operable Unit No. 1 (OU1). Briefing materials were prepared by URS. A copy of the briefing materials was provided to all attendees. A copy of the briefing materials is attached.

### **PRESENTATION**

Jeff Williamson presented the information included in the briefing materials:

- Asbestos area background and history
- Proposed future land use
- Asbestos area interim measures
- Proposed action
- Summary

Key issues included in this discussion:

- Asbestos area interim actions are nearing completion. To date, about 50,000 tons of asbestos-impacted soil have been excavated and transported to an off-site landfill (Butler County Landfill) for disposal. Up to 10,000 tons may remain on site to be excavated and disposed of.

- UPRR proposes to place the remaining asbestos-impacted soil in the relocated Cuming Street embankment. The material would be placed using the same methods as those used for the lead-contaminated soil.
- The City of Omaha recently announced that the Gallup Organization is planning to build an office campus east of the Omaha Shops property. To accommodate this development, the City of Omaha proposes to revise the Cuming Street/Abbott Drive roadway alignment. The revised alignment will move the roadway embankment to the north of the previously proposed alignment.
- Lead-contaminated soil, placed earlier this summer in the proposed embankment for the roadway along its original alignment, will need to be moved to the new roadway embankment location. The lead-contaminated soil is expected to be relocated before the end of this year's construction season.

### **DISCUSSION**

Following are questions/comments that were discussed during the meeting regarding the proposed placement of asbestos-impacted soil in the Cuming Street/Abbott Drive roadway embankment:

1. NDEQ (Dave Haldeman) asked about the characteristics of the asbestos materials encountered, noting that some of the soil samples were described as having "asbestos concentrations ranging up to 100 percent." He was also interested in whether the soil was suitable, with regard to engineering properties, for use as fill material in the roadway embankment.

**Response:** Jeff Williamson indicated that the asbestos materials seemed to be randomly distributed throughout the soil matrix in the asbestos area. Samples exhibiting asbestos concentrations of 100 percent were typically small aliquots or representative samples of materials that were encountered. Generally, no large pockets of asbestos debris were encountered. Intact asbestos-containing debris was typically fist-size or smaller. The area did not exhibit the characteristics of a debris landfill. Based on field observations during excavation, it appears that asbestos materials and building materials were deposited randomly on the ground surface, mixed over time with soil and other fill materials, then spread out and placed in low areas and surface depressions on this portion of the property.

The physical characteristics of the asbestos-impacted soil have been discussed with the City's geotechnical engineer. They have indicated that this material is acceptable as fill material in the roadway embankment.

2. NDEQ (Jay Ringenberg) commented that UPRR was doing a good job with dust control for the site. The Department has had no complaints about dust associated with the many construction activities underway at the site. Ed Southwick indicated that there was one exceedance (not a violation) for airborne particulates based on monitoring data from the downtown air monitoring station located south of the site.

**Response:** UPRR, the City, and URS agreed that everyone working on the site was paying great attention to dust control. It is believed that the one-time exceedance for airborne particulates occurred during June, when the City's demolition contractor demolished the southbound lanes of the Abbott Drive overpass. The monitoring station's close proximity to the overpass demolition probably contributed to the exceedance.

3. NDEQ (Jay Ringenberg) commented that the City's air quality staff (Chester Black) would need to be consulted for concurrence with the proposed plan.

**Response:** Bob Sink (City of Omaha Public Works) responded that Chester Black had been consulted and that he concurs with the proposed plan.

4. NDEQ (Dave Haldeman) asked about UPRR's plans for placement of the lead- and asbestos-containing soils within the embankment fill. Specifically, he was interested in whether the two materials would be mixed or whether they would be segregated in the fill. He also asked whether any "warning" fabric would be placed over the asbestos- and lead-containing soil fill to warn potential future "intruders" that they will encounter these materials.

**Response:** Jeff Williamson responded that all details had not yet been finalized, but that we expected the two materials to be segregated horizontally. Preliminary plans are that the lead-containing soil would be placed at the eastern end of the embankment (starting near the bridge abutment) and the asbestos-impacted soil would be placed to the west of the lead-containing soil. Some clean fill would be placed between the two materials to prevent mixing. A "warning" fabric will be placed on the lead- and asbestos- containing materials, below the final cover.

5. NDEQ (Jay Ringenberg) indicated that the Department didn't think they would have a problem with placing the asbestos-impacted soil in the roadway embankment. He thought they would need to consult with the Department's air quality staff to verify their concurrence.

**Response:** Jeff Williamson indicated that representatives of NDEQ's air quality staff had been consulted previously. Specifically, staff had been consulted to verify that the proposed alternative would comply with National Emission Standards for Hazardous Air Pollutants (NESHAPs) requirements. URS' review indicates that the proposed alternative is compliant with NESHAPs requirements for disposal of asbestos-containing materials (§61.154). Also, representatives of the Nebraska Department of Health and Human Services have been consulted and they also concur that the proposed activity is acceptable.

Following adjournment, meeting attendees toured the site to review overall project progress.

**REQUIRED FOLLOW-UP ACTION**

1. The results of the meeting should be communicated to Ken Herstowski, project manager for USEPA Region VII. Because the work in the asbestos area is being done as an interim action, USEPA must approve the proposed change.

**Action:** Jeff McDermott (UPRR) will follow up by telephone with Ken Herstowski and will transmit this meeting record to him.

2. Written confirmation of NDEQ's concurrence with the proposed plan is required.

**Action:** NDEQ will prepare a letter, addressed to Jeff McDermott, indicating their concurrence with the proposed action. The letter should be copied to Ken Herstowski.

3. The Asbestos Area Interim Measures Plan needs to be amended to reflect the proposed action.

**Action:** URS will prepare the amendment to the Asbestos Area Interim Measures Plan. Copies of the amendment will be forwarded to USEPA and NDEQ will review.

**IMPLEMENTATION SCHEDULE**

Assuming USEPA approval of the proposed action, placement of asbestos-impacted soils in the roadway embankment are expected to begin early the week of October 16.

**Distribution:** Meeting Attendees  
Ken Herstowski

**Attachments:** Meeting Handout (Briefing Materials)



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# **Asbestos Area Corrective Action October 2000 Union Pacific Railroad Omaha Shops**



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# Meeting Purpose

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- Review progress of asbestos area corrective action
- Discuss alternate asbestos disposal method
- Overall project progress update





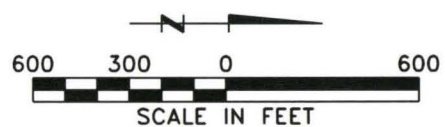
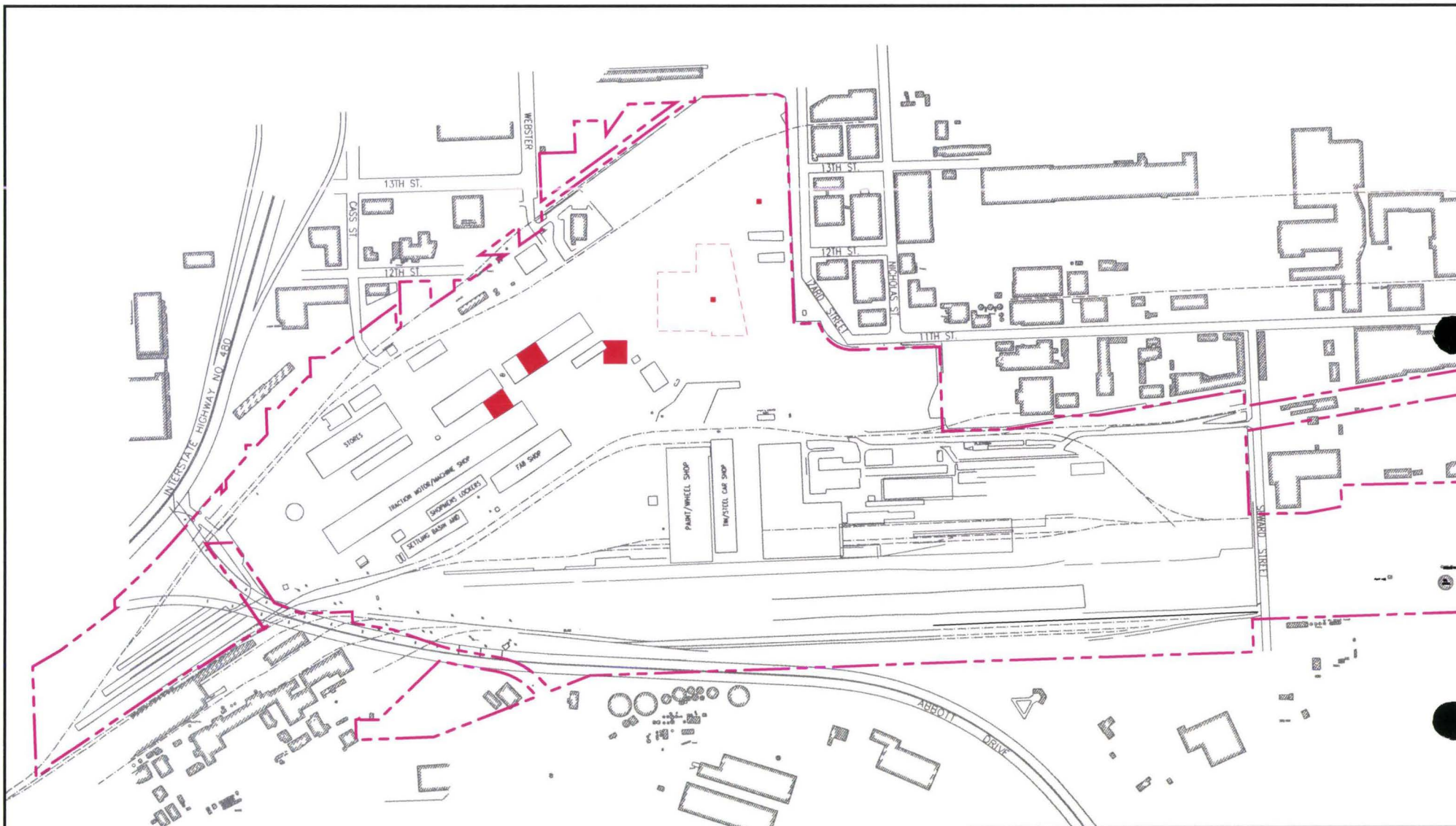
# Asbestos Area Background

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- Northwest area of Omaha Shops
- Former Car Dismantle Area
- Asbestos concentrations in soil range from less than 1 percent up to 100 percent
- Random horizontal and vertical distribution
- Probable source was dismantling of steam locomotives and building debris
- Apparently mixed with soil and used to fill low areas



ENVIRONMENTAL MANAGEMENT



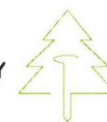
# LEGEND

-  STRUCTURES
-  RAILROAD TRACK
-  PROPERTY LINE
-  ASBESTOS AREA

## SITE PLAN



OMAHA SHOPS  
UNION PACIFIC RAILROAD COMPANY



**URS**

DRN BY	DAP	DATE	10/07/00	PROJECT NO.	FIG. NO.
CHK'D BY		REVISION		45-091MC204.04	1

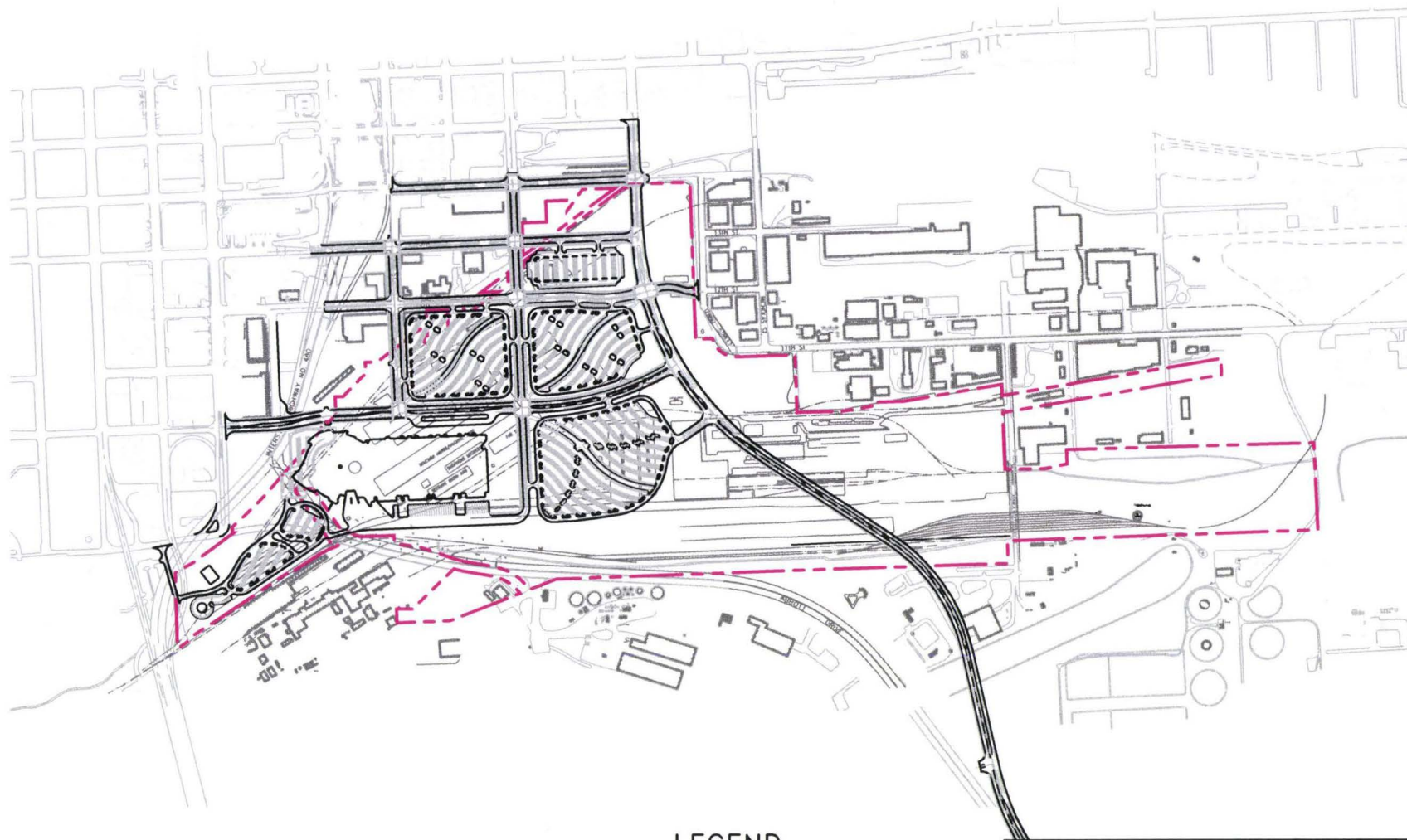
October 09, 2000 11:11:00 a.m.  
Drawing: T:\91MC204\SP04\T03100\FIG\_1.DWG (DAP)  
Xrefs: sdcex2.DWG DRILLHOLES.DWG uprrpropline.DWG

# Future Land Use




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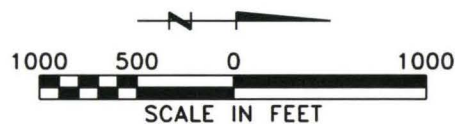
- **Future Cuming Street corridor**
- **Adjacent property planned to be used as surface parking for Convention Center/Arena**
- **Future development corridor**





# LEGEND

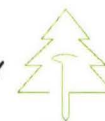
-  STRUCTURES
-  RAILROAD TRACK
-  PROPERTY LINE



## DEVELOPMENT PLAN



OMAHA SHOPS  
UNION PACIFIC RAILROAD COMPANY



**URS**

DRN BY	DAP	DATE	10/07/00	PROJECT NO.	FIG. NO.
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October 10, 2000 9:09:30 a.m.  
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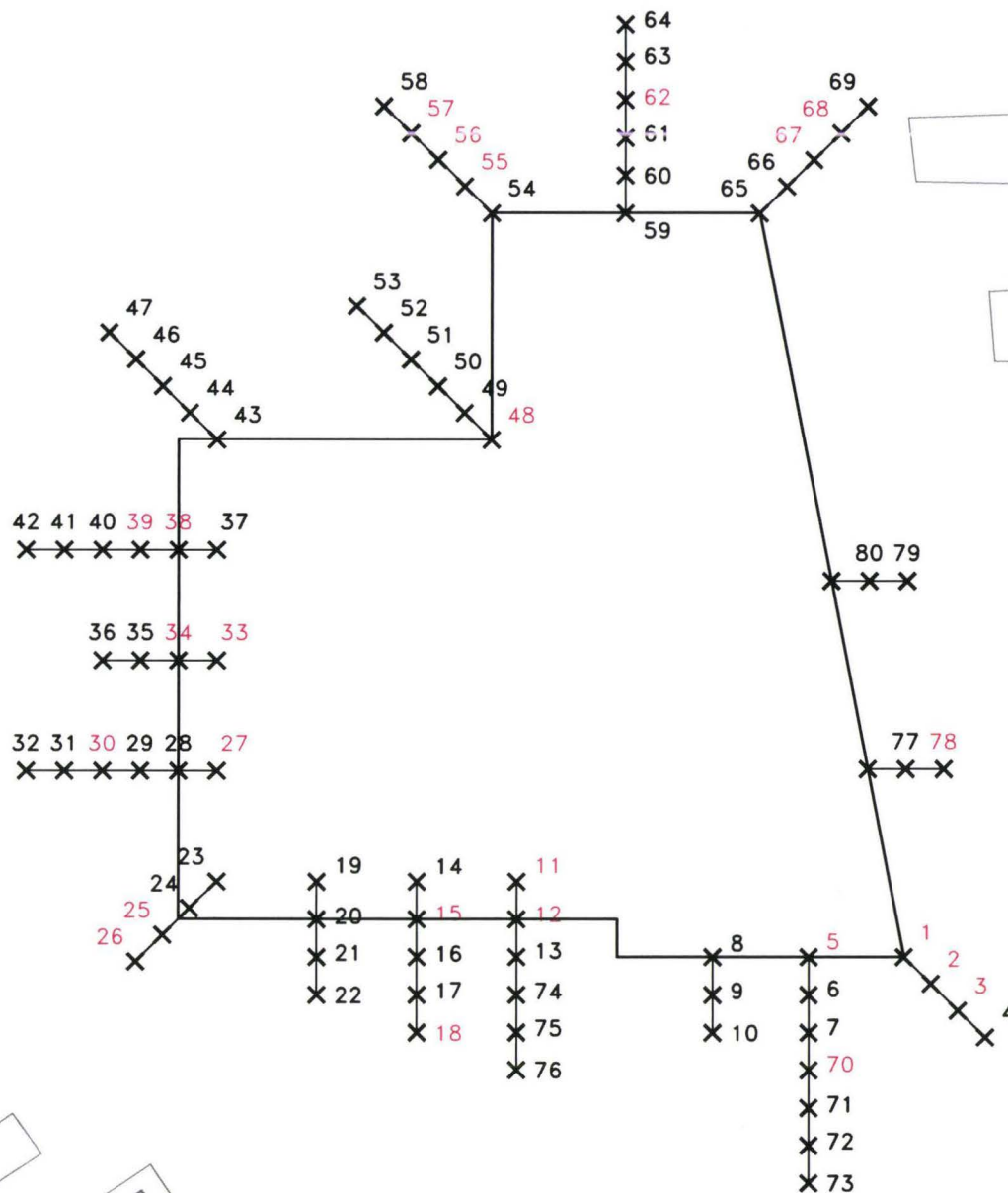
# Asbestos Area Interim Measures

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- **Excavate asbestos-impacted soil and transport to Butler County Landfill for disposal**
- **Backfill with clean soil**
- **ENTACT under contract with UPRR to remove and dispose of asbestos-impacted soil**
  - **1440 tons estimated**
  - **50,000 tons removed and disposed to date**
  - **Up to 10,000 tons may remain**







# ASBESTOS PIT 4 EXCAVATION



OMAHA SHOPS  
UNION PACIFIC RAILROAD COMPANY



URS

DRN BY	DAP	DATE	09/25/00	PROJECT NO.	45-091MC204.04	FIG. NO.	1
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# Proposed Action

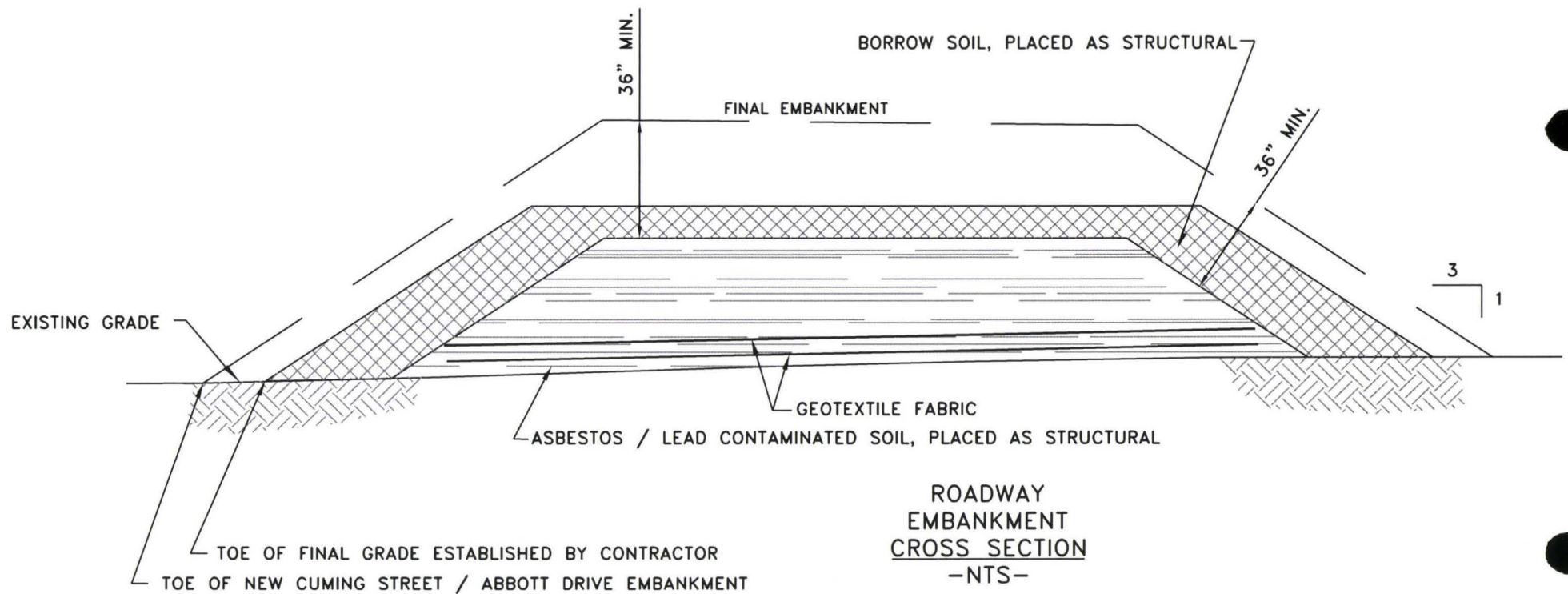
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- **Excavate asbestos-impacted soil**
- **Place in relocated Cuming Street roadway embankment**
- **Minimum 36-inch final cover to prevent exposure (same as lead-contaminated soil)**
- **Long-term management of asbestos- and lead-contaminated soils**
- **UPRR retains liability and long term management and maintenance responsibility**









# ROADWAY EMBANKMENT CROSS SECTION



OMAHA SHOPS  
UNION PACIFIC RAILROAD COMPANY



**URS**

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# Summary

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- **Efficient, timely and cost effective approach to complete asbestos removal**
- **Consistent with NESHAPS requirements (§61.154) for disposal of asbestos-containing waste material**
- **Protective of human health and the environment**
- **Less opportunity for air emissions**
- **Conserves landfill capacity**
- **Consistent with approach for other corrective measures at the site**



# STATE OF NEBRASKA

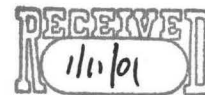


Mike Johanns  
Governor

November 22, 2000

## DEPARTMENT OF ENVIRONMENTAL QUALITY

Suite 400, The Atrium  
1200 'N' Street  
P.O. Box 98922  
Lincoln, Nebraska 68509-8922  
Phone (402) 471-2186



J.D.M.

NOV 27 2000

Mr. Jeffrey D. McDermott, P.E.  
Mgr. Environmental Site Remediation  
Union Pacific Railroad Company (UPRR)  
Room 930, Operations  
1416 Dodge Street  
Omaha, Nebraska 68189

RE: Request for Alternate Disposal of Asbestos-Containing Soil

Dear Mr. McDermott:

On October 10, 2000, during a meeting at your facility, representatives of the Nebraska Department of Environmental Quality (NDEQ) were presented with a plan and request to place remaining asbestos-containing soil in the relocated Cuming Street roadway embankment, rather than continue the current practice of disposing of the asbestos-containing soil at the Butler County Landfill. NDEQ approves this plan contingent upon the following conditions:

1. The placement of the asbestos-containing soil must be done in accordance with the written plan (submitted during the meeting and on file at the NDEQ). Components of this plan included cover specifications, statements that UPRR would retain liability for the emplaced soil and assume responsibility for its long-term management and maintenance, and statements that the asbestos-containing soil would be handled in accordance with federal asbestos disposal regulations and in a manner that is protective of human health and the environment.
2. Notices and restrictions must be attached to property deed(s) and road plans that will adequately warn of the existence of the asbestos-containing soil and provide instructions to ensure that future activities that might disturb the soil (digging, trenching, re-grading, etc.) are conducted in a manner that is protective of human health and the environment. The liner covering the asbestos-containing soil must be visibly distinctive and exhibit adequate notices.
3. This plan is not rejected by any person(s) other than the NDEQ which may have the authority to prohibit its implementation.
4. UPRR must notify the NDEQ and make arrangements, approvable by the NDEQ, for the disposal of any asbestos-containing soil that cannot or will not be emplaced in the roadway embankment in accordance with the proposed plan. This condition could apply if the amount of asbestos-containing soil exceeds the embankment's capacity to encapsulate it in accordance with the plan, or an authorized person (i.e., road construction engineer) rejects any of the soil for placement in the embankment.

If you have any questions regarding this letter, please call Mr. Ed Southwick at 402-471-4875.

Sincerely,

A handwritten signature in cursive script that reads "William C. Gidley".

William C. Gidley  
Waste Management Section Supervisor

cc: Mr. Chester Black, Omaha Air Quality Control  
Mr. Kenneth Herstowski, EPA Region 7  
Mr. Dale Jacobson, Jacobson Helgoth Consultants, Inc.